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☐ Reply to Alabama Address

August 23, 2016

Honorable Gary R. Brown
Magistrate Judge
United States District Court EDNY
100 Federal Plaza, Courtroom 840
P. O. Box 9014
Central Islip, NY 11722-9014

Re: Status Report
Case: Subramaniam v. Driscoll Investments, LLC et al.
Case Number: 15-cv-05591-DRH-GRB

Dear Magistrate Judge Brown:

We write in response to your order of August 3, 2016 requiring a written status report be filed no later than August 24, 2016 in the above referenced matter.

There are three defendants in this matter: Christopher D. Driscoll, Driscoll Investments, LLC and Ravindra Gopal. We effected timely service upon Christopher D. Driscoll on January 22, 2016 and upon Driscoll Investments, LLC on March 21, 2016. The defendants did not answer the Summon and Complaint within the time required under the Federal Rules of Civil Procedure. On August 21, 2016 we filed a Request for Default for failure to Answer with the Clerk of the Court and on August 23, 2016, the Clerk entered a Certificate of Default against Defendants Christopher D. Driscoll and Driscoll Investments, LLC. Given the Clerk's Certificate of Default for failure to Answer, we will file a Motion for Default Judgment with attendant Affirmation within the next seven days.

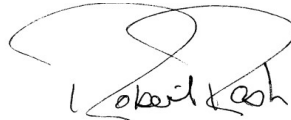
Defendant Ravindra Gopal is a citizen of India, residing in India. We discussed service on a citizen of Indian with the Plaintiff, our client, and informed him that service must be by a process service pursuant the Hague Convention and that the cost of service would be approximately \$2,000 or more. Given the cost, the Plaintiff was hesitant to proceed and

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requested alternatives. We then discussed the possibility of obtaining a waiver of service from Defendant Ravindra Gopal with our client. Our client said he would contact Mr. Gopal and request he voluntarily accept service to save costs. In that regard, we have supplied our client with the Notice and Waiver of Service of Summons along with copies of the Summons and Complaint to present to Defendant Ravindra Gopal for his signature. If Defendant Ravindra Gopal does not timely sign the Waiver of Service of Summons then we have our client's authorization to immediately retain a process server to serve Defendant Ravindra Gopal pursuant to the Hague Convention accordingly.

Thank you in advance for reviewing this response to your order for a written status.

Respectfully submitted,
RASH & BAKSHI

By: 

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